

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION

THE UNITED STATES OF)
AMERICA,)

Plaintiff,)

v.)

Civil Action No.: 1:09-cv-02423-KOB

JAMES J. STRICKER;)

DANIEL R. BENSON;)

KASOWITZ, BENSON, TORRES)

& FRIEDMAN, LLP;)

DONALD W. STEWART, PC;)

DON BARRETT;)

THE BARRETT LAW FIRM, PA;)

CHARLES E. FELL, JR.;)

CHARLES CUNNINGHAM, JR.;)

CUNNINGHAM & FELL, PLLC;)

JOHNSTON DRUHAN, LLP;)

GREG CUSIMANO;)

CUSIMANO, KENNER,)

ROBERTS, & RALEY, PC;)

THE CODY LAW FIRM, PC;)

MONSANTO COMPANY;)

SOLUTIA, INC. PHARMACIA)

CORPORATION TRAVELERS)

COMPANIES, INC; d/b/b)

THE TRAVELERS INDEMNITY)

COMPANY; AMERICAN)

INTERNATIONAL GROUP,)

INC.;)

Defendants.)

**DEFENDANTS' MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO PLAINTIFF'S COMPLAINT**

COME NOW the Defendants, DON BARRETT, THE BARRETT LAW FIRM, PA, CHARLES E. FELL, JR., CHARLES CUNNINGHAM, JR., AND CUNNINGHAM & FELL, PLLC, by and through the undersigned, and respectfully move the Court to enter an Order extending the time to file responsive pleadings and as grounds for said motion states as follows:

1. All of the parties represented by the undersigned have just recently been served.
2. There is an agreement between all of the named parties represented by the undersigned and the United States government to extend the time for filing responsive pleadings to February 16, 2010.
3. It would not materially or substantially affect the progress of the case and it is in the best interest of all parties and the interest of justice to extend such time for responsive pleadings.

WHEREFORE, PREMISES CONSIDERED, the Defendants, Don Barrett, The Barrett Law Firm, PA, Charles E. Fell, Jr., Charles Cunningham, Jr., and Cunningham & Fell, PLLC, through the undersigned, respectfully request this court to enter an Order extending the time to file responsive pleadings in this

matter to February 16, 2010, as agreed by the parties, and any such other relief the Court deem appropriate and necessary.

Respectfully submitted,

/s/ J. Gusty Yearout

J. Gusty Yearout (asb-6253-a43j)
Attorney for Defendants, Don Barrett,
The Barrett Law Firm, PA, Charles
E. Fell, Jr., Charles Cunningham, Jr.,
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing to the following through the Court's CM/ECF filing system and by U. S. Mail on January 26, 2010:

Attorneys For United States

Cathy J. Burdett

J. Christopher Kohn

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Civil Division

Commercial Litigation Branch

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/s/ J. Gusty Yearout

OF COUNSEL